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Counsel for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JEFFREY MOLNAR and WESLEY
THORNTON, AILEEN MARTINEZ,
CHIQUITA BELL, TEYIA BOLDEN, and
ANTOINETTE STANSBERRY, on behalf
of themselves, all others similarly situated,

Plaintiffs,

vs.

NCO FINANCIAL SYSTEMS, INC., a
Pennsylvania Corporation,

Defendant.

CASE NO. 3:13-cv-00131-BAS-JLB
CLASS ACTION

**PLAINTIFFS' UNOPPOSED
MOTION TO CONTINUE
DEADLINE TO FILE RESPONSE IN
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT [DKT. NO. 152]**

1 Plaintiffs Wesley Thornton, Aileen Martinez, Chiquita Bell, Teyia Bolden and
2 Antoinette Stansberry (“Plaintiffs”), without opposition from Defendant NCO Financial
3 Systems, Inc. (“NCO” or “Defendant”), by and through their counsel of record,
4 respectfully move this Court for an Order continuing the deadline for Plaintiffs to file
5 their response in opposition to Defendant’s Motion for Summary Judgment, filed at Dkt.
6 No. 152. Plaintiffs state the following in support of their request.

7 WHEREAS, on March 9, 2015, Defendant filed a Motion for Summary Judgment
8 with a hearing date of April 20, 2015. Dkt. No. 152.

9 WHEREAS, on March 26, 2015, the Parties jointly moved to extend the Summary
10 Judgment briefing deadlines to allow for the completion of certain relevant discovery,
11 Dkt. No. 160.

12 WHEREAS, on April 2, 2015, the Court granted the Parties’ joint motion and
13 extended Plaintiffs’ deadline to respond to Defendant’s summary judgment motion to
14 April 20, 2015, and Defendant’s reply deadline to April 27, 2015;

15 WHEREAS, during the week of April 13, 2015, the counsel for the Parties entered
16 discussions regarding the settlement and release of certain Plaintiffs’ claims;

17 WHEREAS, the potential settlement of certain Plaintiffs’ claims will necessarily
18 affect the scope and substance of Plaintiffs’ opposition to Defendant’s summary
19 judgment motion, along with the scope and substance of Defendant’s summary judgment
20 reply;

21 WHEREAS, the Parties met and conferred on April 17, 2015, regarding a one-
22 week extension for Plaintiffs to respond to Defendant’s Motion for Summary Judgment.
23 Defendant agreed to this request and does not oppose this motion. Ex. 1.

24 GOOD CAUSE exists to grant Plaintiffs’ request so as to allow the Parties to
25 negotiate the resolution of certain Plaintiffs’ claims, and for Plaintiffs to modify their
26 summary judgment response accordingly.

27 THERFORE, Plaintiffs request, and Defendant does not oppose, an order
28 extending the deadline for Plaintiffs to file their response in opposition to Defendant’s

1 Motion for Summary Judgment from April 20, 2015 until April 27, 2015. Defendant's
2 reply, if any, would be due on May 4, 2015.

3
4 DATED: April 17, 2015

Respectfully submitted,

5 By: /s/ Kas L. Gallucci

6 *Kas L. Gallucci*

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